



State of California  
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**Inquiry:** I would like clarification on the RT Scope of Practice regarding ECMO. Is it within the Scope of Practice of the RT to function as an ECMO Specialist with its related job responsibility including medication and blood product administration?

**Response:** The intent of the Practice Act recognizes the existence of overlapping functions between physicians and surgeons, registered nurses, physical therapists, respiratory care practitioners, and other licensed health care personnel to permit sharing of functions within organized health care systems (3701, Article 1, General Provisions).

The authority for licensed RCP's to administer cardiopulmonary medications, intravenous (IV) or other, related to respiratory care procedures is found in section 3702(b) of the Business and Professions Code. Here it states, "Pharmacologic and diagnostic and therapeutic agents related to respiratory care procedures necessary to implement a treatment, disease prevention, pulmonary rehabilitative or diagnostic regimen prescribed by a physician and surgeon", without the specification of a delivery route.

The role of the RCP as an ECMO specialist continues to grow both academically and clinically. Academically, RCP's are utilized to coordinate ECMO programs and RCP's are continuing to receive the necessary training and education to deliver this important service across the country.

Based upon the intent of the Practice Act and the continued support from the medical community across the country, the Board would consider the job responsibilities of the ECMO specialist, including medication and blood product administration, to be within the scope of a licensed RCP.

As such, the onus is on the organized health care system to determine and institute appropriate policies, practice guidelines, training and competencies that would provide clinical functions in a manner that would be safe when administered to the public.

Reference # 2003-C-22

*This determination does not constitute a declaratory decision under the comprehensive provisions of the Government Code sections 11465.10 – 11465.70.*